

CORRES. CONTROL  
OUTGOING LTR. NO.

DOE ORDER # 4700.1

05-RF-00114

DIST.	LTR	ENC
ETER, T.J.		
RRERA, D.W.	X	
NDAY, D.C.		
NG, J.		
LE, J.L.		
RTINEZ, L.A.		
ZZUTO, V.M.		
ELTON, D.C.		
EARS, M.S.		
JOR, N. R.		

EAN, C.		
ECK, C.		
DSS, D.		
RANCIS, M.		
REIBOTH, C.		
EIS, A.		
IBBS, F.	X	
UMISTON, T.		
NAPP, S.		
AVORATO, K.		
NSINBGLER, H.		
YERS, K.		
ESTA, S.	X	X
ORTH, K.		
MAN, K.		
LAPPERT, R.		
RIMROSE, A.		
ICHARDELLA, R.		
NYDER, D.P.		
WARTZ, J.M.		
VARD, D.A.	X	X
VIEMELT, K.		
JILLS, S.		
HULER, K.		

CORRES. CONTROL	X	X
ADMIN RECD/T130G	X	X
TRAFFIC		
PATSH30		

CLASSIFICATION:

UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE:

Date:

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

<input type="checkbox"/> PARTIAL/OPEN	
<input type="checkbox"/> CLOSED	

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

SMN:pvt



MAR - 9 2005

05-RF-00218  
05-DOE-00114

Mr. Steven H. Gunderson  
Rocky Flats Cleanup Agreement Project Coordinator  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

CLOSURE DESCRIPTION DOCUMENT FOR CLOSURE OF RCRA PERMITTED CONTAINER  
STORAGE UNIT 750.1 - SMN-016-05

Dear Mr. Gunderson:

Pursuant to the Rocky Flats RCRA Part B Permit (June 2004), Kaiser-Hill Company, L.L.C. and the United States Department of Energy, Rocky Flats Field Office (DOE, RFPO) are submitting this Closure Description Document for the RCRA Permitted Container Storage Unit 750.1, which is anticipated to begin in June 2005.

The Closure Description Document contains a description of the system to be closed, the selected method of closure, the types of contamination to be addressed and the schedule for closure activities. We request approval of the Closure Description Document within 30 days of receipt.

If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation, Industrial D&D, & Site Services (RISS) at 303-966-6386.

*Stephen Nesta* 3/1/05  
Date

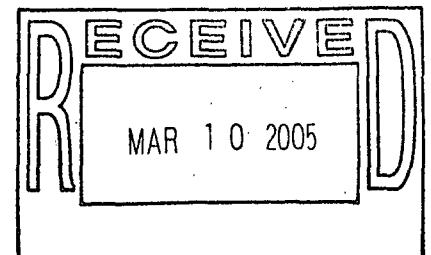
Stephen Nesta  
Environmental Manager  
Remediation, Industrial D&D, & Site  
Services  
Kaiser-Hill Company, L.L.C

*Joseph A. Legare* 3/3/05  
Date  
Joseph A. Legare  
Director  
Project Management Division  
Rocky Flats Project Office  
U.S. Department of Energy

Attachment:  
As Stated

KLM:pvt

cc:  
G. Morgan, RFPO  
H. Ainscough, CDPHE



ADMIN RECORD

1A-A-002562

**Closure Description Document  
For RCRA Permitted Container Storage Unit 750.1**

U.S. Department of Energy  
Rocky Flats Environmental Technology Site  
EPA ID No. CO7890010526

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## **1.0 INTRODUCTION**

### **1.1 Purpose and Scope**

Part X of the Rocky Flats Environmental Technology Site's (RFETS or Site's) RCRA Part B-Permit, CO-04-06-23-01 addresses closure of permitted container storage. Closure of the container storage is subject to the Closure Plan, as described in Part X and to a subsequent Closure Description Document (CDD) that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure requirements.

This CDD applies to RCRA Container Storage Unit 750.1: Tents 2-6 and 12, 21 cargoes that were moved from RCRA Unit 1, and the 750-asphalt pad. RCRA hazardous waste was stored in these locations until the containers were prepared for offsite shipment and repacked in some cases. Closure of tents will be conducted under an administrative clean closure, closure of the 21 cargo containers will be conducted under the "Debris Rule" Treatment, and closure of the pad will be by removal.

### **1.2 Unit Closure Notification and Schedule**

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to close the unit identified in Section 3.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to begin June 1, 2005. The identified closure activities are expected to be completed within 180 days.

Within 30 days after completion of closure activities a summary report will be submitted to CDPHE containing details about the closure of this portion of the unit.

### **1.3 Facility Contacts**

The contacts for closure activities at RFETS are:

Environmental Manager	Director
Remediation, Industrial D&D, & Site Services Kaiser-Hill Company, L.L.C Golden, CO 80403-8200 (303) 966-6386	Project Management Division Rocky Flats Project Office U.S. Department of Energy Golden, CO 80403-8200 (303) 966-2282

## **2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD**

Permitted Hazardous Waste Container Storage Area, Unit 750.1 will be closed as follows:

- 1) The 21 cargo containers will be closed using the Unit Removal in Conjunction with Debris Rule Treatment, described in the Site's RCRA Permit at Part X.D.2.a. Closure will be conducted by an Alternative Treatment Standard for Hazardous Debris, as denoted in Table 1 of 6 CCR 1007-3, Section 268.45, to meet the standard for a clean debris surface
- 2) The tent structures of unit 750.1 will be closed using Clean Closure Option 1 – Unit Review and Inspection, described in the Site's RCRA Permit at Part X.D.1.a.
- 3) The asphalt pad of unit 750.1 will be closed using Unit Removal without On-Site Treatment, described in the Site's RCRA Permit at Part X.D.3.

### 3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

Unit 750.1 is located in the northeast area of the Industrial Area of the Site, on the 750 Pad which is a sloped paved pad, where multiple tent structures were constructed and several Heated Safety Storage Units (HSSUs)/cargoes to store waste were placed. The tent structures are erected on bermed asphalt-paved pads to protect the waste containers from the adverse effects of weather. The pad was used to store high gram transuranic hazardous waste in POCs, low gram transuranic hazardous sludges, low level hazardous and non-radioactive hazardous waste. Activities on the pad included: container storage, tank storage, inspection, sampling, repackaging, sludge processing, receiving and offsite shipping. This Closure Description Document addresses only the container storage portion of the unit. Sludge Processing, including the "Barn" structure (Tent 15) was addressed in the Closure of Treatment Unit 750.3B (03-RF-01458). Tank Storage was addressed in Closure of Unit 750.2A, B and C, (00-RF-01092) and the Container Storage for Transport Vehicles portion of Unit 750.1 was administratively closed on October 15, 2004.

Two ventilated Perma-Cons where repackaging operations are conducted will be closed under the Closure of the Treatment Unit S002 (Material Stewardship will close this unit in April 2005 under a separate CDD).

The RCRA permitted container storage area was originally permitted on August 8, 1996 as Unit 25 but later became Unit 750.1. In 1996, the unit consisted of four tent structures, Tents 2, 5, 6, 12, and outside storage. In 2004, when the storage tanks were all removed and closed, Tents 3 and 4 became part of Unit 750.1. Additionally, in November and December 2003, 21 cargo containers were transferred from Unit 1 to Unit 750.1. Only fifteen of the cargo containers were used at Unit 750.1. The cargo container numbers were 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, and 23. The remaining six cargo containers transferred from Unit 1 to Unit 750.1 remained empty at the 750 pad. Those cargo numbers are 3, 4, 5, 6, 7, and 8.

Unit 750.1 received TRU, TRM, LLW, LLM, and HAZ waste from various on-site waste generators over the life of the unit. Waste was received in containers that meet on-site shipping specifications and/or meet (or formerly met) Department of Transportation (DOT) specifications. The tent panels had no direct contact with the waste stored in the containers; however during Pond Sludge Processing,

sludge was accidentally splashed on to some of the tent panels. When this occurred the effective areas were immediately decontaminated with decon solution in accordance with PRO-1505-750Pad-PSTANK-DECON, Pond Sludge Tank Decontamination for 750Pad Project. Confirmation of successful decontamination is through radiological surveys. Site policy has been, if there is no radiological contamination present then there is also not any RCRA contamination present.

Bulk liquid waste was stored in the cargo containers, which have built in secondary containment pans. Historically, containers with bulk liquids have leaked over the years inside these cargoes. Any free liquids identified in solid waste by Real-Time-Radiography were stored in either catch pans or large secondary containment areas made out of HDPE in Tent 3, 4 and 6. No documented leaks or releases occurred in either the catch pans or the HDPE liner besides natural precipitation. The asphalt pad itself has only been contaminated with spills of pond sludge and sludge from B374. Although immediately cleanup was conducted after the spill, liquid absorbed into the pavement. Therefore the codes that will apply to the pad are F001, F002, F003, F005, F006, F007, and F009.

The EPA waste codes approved for this unit D001-D043, F001-F009, F027, F039, P001-P205, and U001-U404. However, a review of WEMS shows that only waste with the following codes were stored in this unit D001-D014, D018, D019, D021-D036, D038, D039, D040, D042, D043, F001-F009, P001, P002, P004, P005, P010-P012, P015, P016, P022, P024, P027-P030, P037, P050, P051, P059, P063, P076, P077, P087, P092, P098, P099, P104, P106, P113, P116, P119, P120, P123, U002-U004, U007, U009, U020, U022, U025, U027, U028, U031, U036, U038, U039, U041, U042, U044, U050, U055, U056, U057, U060, U061, U063, U067-U072, U075, U077-U081, U083, U098, U101, U103, U105-U108, U111-U113, U116, U117, U120-U123, U127, U129-U131, U134, U135, U144, U145, U151, U154, U159, U160, U161, U162, U165, U166, U170, U188, U196, U197, U201, U202, U204, U207-U211, U213-U219, U222, U225-U228, U234, U239, U240, U247, U353, and U359. A review of the operating record for this unit revealed that a number of these EPA hazardous waste codes were applied to containers of labpacked wastes.

#### **4.0 SPECIFIC CLOSURE ACTIVITIES**

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

##### **4.1 Establishment of System Boundaries and Scope of Closure**

The boundaries for the RCRA container storage Unit 750.1 consist of Tents 2-6 and 12, the pad itself and 21 cargo containers.

The cargo containers will be sprayed with a water and surfactant solution (i.e. chemical extraction technology). The water will be collected, analyzed for disposal, and managed at the appropriate Site water

management unit. A professional engineer, to ensure a clean debris surface is met, will inspect the floor and rollers of the cargo container. If a clean debris surface is obtained, the cargoes will be disposed of as non-routine sanitary waste or low-level waste depending on the radiological contamination.

Any spills or releases to the tent structures have been cleaned up and decontaminated in accordance with current Waste Operations Procedures (PRO-1505-750Pad-PSTANK-DECON). Additionally, no radiological contamination has been found on the tent material; the site policy has been if there is no radiological contamination present then there is also not any RCRA contamination present. Therefore, this portion of the unit will be closed administratively under Clean Closure Option 1 – Unit Review and Inspection.

The pad and berm will be closed by removal and disposed of as LLM or hazardous waste, depending on the radiological surveys.

## **5.0 DISPOSITION OF CLOSURE WASTES**

Decontamination water will be collected for sampling, transfer and management in one of the Site's water management units.

The asphalt pad will be managed as LLM waste.

The tent structures and the cargo containers will be handled as non-routine sanitary, depending on radiological contamination.

## **6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE**

The closure activities for this unit will not impact the soils surrounding Unit 750.1. Soil contamination was evaluated as part of the environmental restoration activities conducted under RFCA for IHSS Group 700-8 IHSS 700-214, Pondcrete/Saltcrete Storage, and a No Further Accelerated Action (NFAA) was approved by CDPHE on December 17, 2004. Post-closure care activities are not necessary as part of the closure for this treatment unit.

## **7.0 RECORDKEEPING**

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure:

- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document.
- Record of any sampling activities
- Records of waste generated during closure activities

## **8.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT**

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

## 9.0 REFERENCES

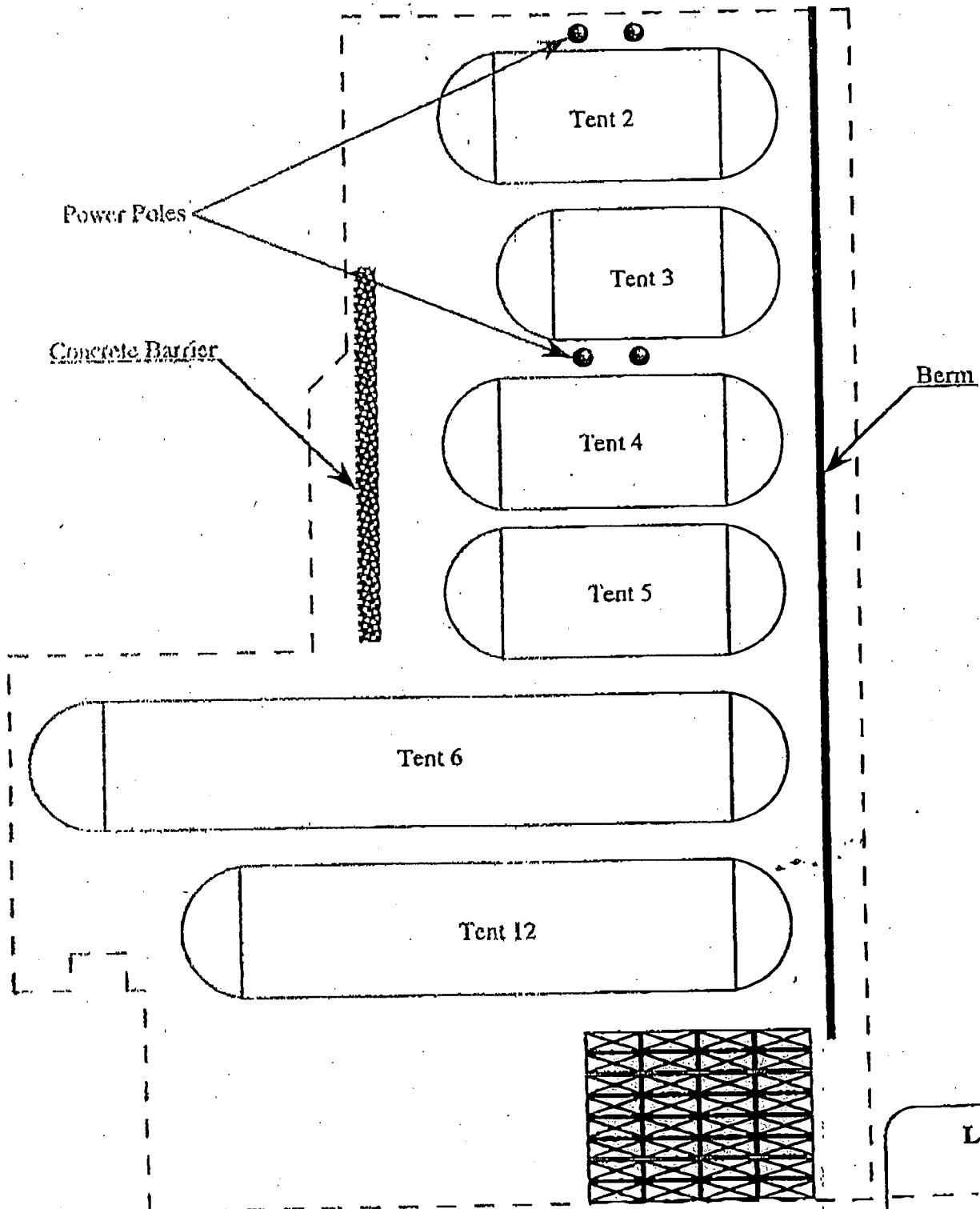
Code of Colorado Regulations, Vol. 6, No. 1007-3.

Rocky Flats Environmental Technology Site RCRA Permit, Part X: Closure, effective 6/23/2004.

Pond Sludge Tank Decontamination for 750Pad Project, PRO-1505-750Pad-PSTANK-DECON




RCRA Unit 750.1  
Outside Storage Arrangement  
750 Pad

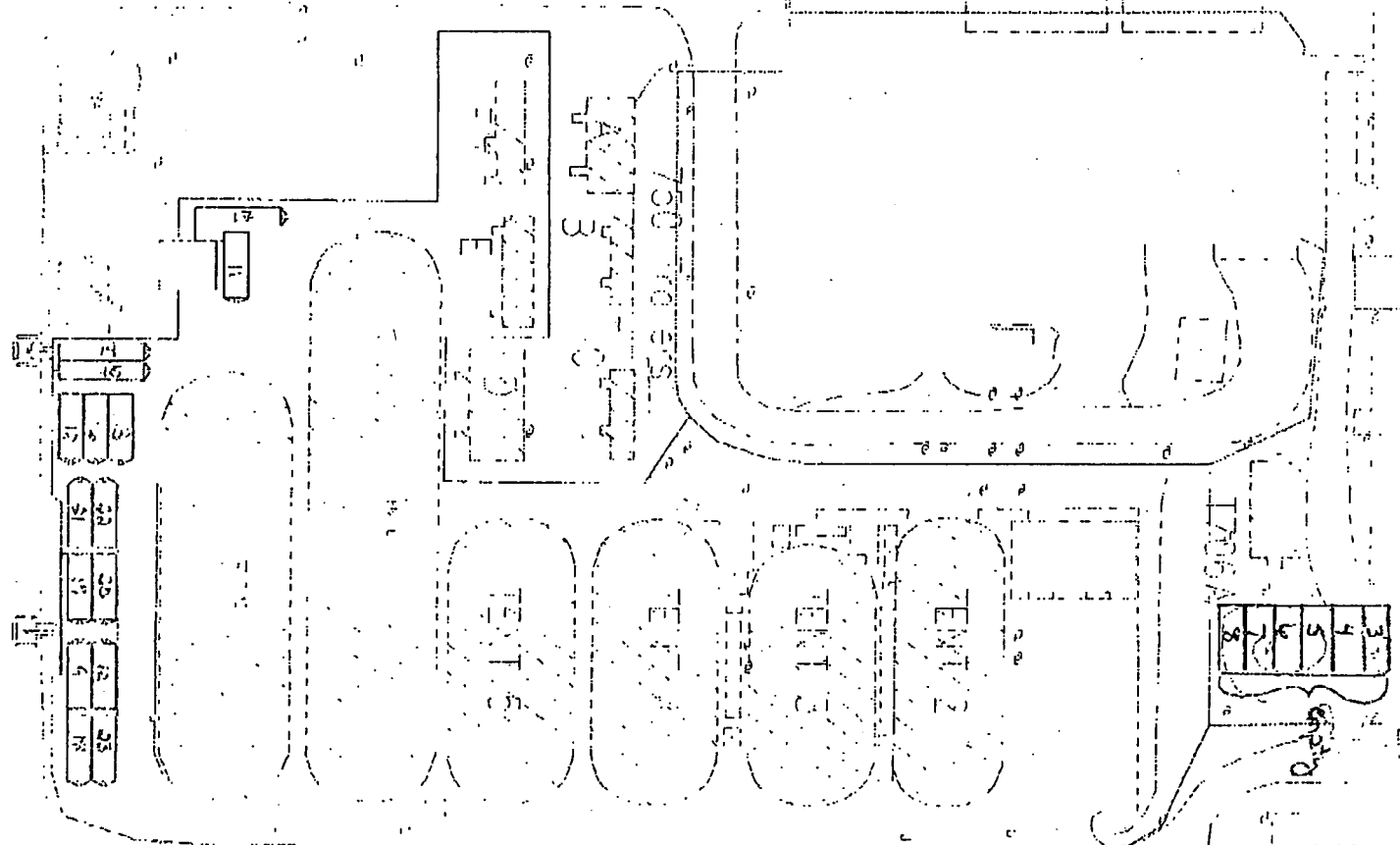


**Legend:**

--- = Fence

 = Stacked Crates

1707C 1707D



TENTH STREET